

EXHIBIT 10

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG
APPLICATION ANTITRUST
LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All Direct Purchaser Class Actions

Master File No.
19-md-02878-NMG

**DECLARATION OF AMY FRINGER REGARDING
THE QUALIFICATIONS AND SETTLEMENT NOTICE PLAN
OF RUST CONSULTING, INC.**

I, Amy Fringer, declare as follows:

1. I am a Senior Project Manager at Rust Consulting, Inc. ("Rust"). I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
2. I submit this declaration at the request of counsel for the direct purchaser class ("Class Counsel") to describe Rust's qualifications, the proposed settlement notice plan, and Rust's settlement administration services in the above-captioned litigation.
3. I have been involved in the implementation of notice plans for class action settlements for more than eight years.
4. Rust specializes in class action notification and claims administration services, including telephone support and web-based support, direct mail services, claims processing, and settlement fund distribution. Rust has extensive experience in class

action matters, having provided services in class actions ranging in size from 100 to 100 million settlement class members, and has provided notification and/or claims administration services for over 6,500 settlements.

5. The Court previously appointed Rust as the class certification notice administrator (paragraph 12 of the Court's September 24, 2021, Order Approving the Form and Manner of Notice, Appointing a Notice Administrator, and Formally Appointing Class Representatives and Lead Class Counsel (ECF 469-1)). Rust's services included formatting, printing, and mailing the class certification notice to potential class members; receiving and processing all mail received, including undeliverable mail, requests for exclusion, and correspondence; and establishing and maintaining a website to provide information and Court-approved documents to potential class members.

6. As described in the November 22, 2021, Declaration of Jessica Jenkins (ECF 506-1), Rust generated a case-specific database comprised of 139 individual records covering the 105 class members (including alternate or successor names/addresses) and successfully delivered class certification notice to every potential class member and/or their successor entities.

7. Rust was recently retained by Class Counsel to provide settlement notice and claims administration services in this case. Rust's settlement notice services will include formatting and printing of the settlement notice; mailing the settlement notice to all potential class members in Rust's existing case-specific database; receiving and processing all mail received, including undeliverable mail, objections, or other correspondence, and responding to any class member inquiries via e-mail at

info@RanbaxyAntitrustLitigation.com; and maintaining the website, www.RanbaxyAntitrustLitigation.com, to provide information and Court-approved documents to potential class members concerning the proposed settlements. Following final approval of the settlement, Rust's services will include formatting and mailing of settlement claim forms pre-populated with each individual class member's calculated pro rata settlement award; processing and validating all submitted claims forms; following up by phone, email, and/or mail with any class member that does not timely return a claim form to confirm that the decision not to submit a claim form was intentional and address any questions the class member may have; and distributing settlement payments to each class member.

8. As with the class certification notice, prior to mailing both the settlement notice and claim forms, all addresses will be checked against the National Change of Address (NCOA) database maintained by the United States Postal Service (USPS). Notices returned by USPS as undeliverable will be re-mailed to any forwarding address available through postal service information. Any returned mailing that does not contain a forwarding order with a new address indicated will be researched through standard skip tracing and re-mailed if a new address is obtained. The mailing database will be updated with new address information from re-mails and successful address searches.

9. The proposed settlement notice plan described above is consistent with settlement notice plans that Rust has successfully implemented in multiple other similar pharmaceutical antitrust class action settlements.

10. At the conclusion of the notice plan, Rust will provide a final report verifying its implementation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22nd day of April, 2022, in Edina, Minnesota.


Amy Fringer